

Wastewater Monitoring Data¹
November 2003

Analytical Results Required by Special Conditions Nos. 20-22

i. Special Condition No. 20

In accordance with the requirements of Special Condition No. 20, grab samples were collected from a sampling port in the pipeline downstream from the acidulation station every day when transfers to the vessels were occurring. Table A-1 below presents the data reported by the approved laboratory. The signed, original certificates of analyses are on file at the Piney Point site; copies of any or all of these certificates are available upon request.

Table A-1
Analytical Data

Date	Vessel/Voyage No./Sample No.	pH (Standard Units)	Total Ammonia (mg/L)
11/1/03	Downing/2/Sample 2	6.86	30.4
11/2/03	Downing/2/Sample 3	6.89	31.0
11/3/03	Barge NY/24/Sample 1	6.77	30.4
11/4/03	Barge NY/24/Sample 2	6.76	19.4
11/6/03	Downing/3/Sample 1	6.77	19.4
11/7/03	Downing/3/Sample 2	6.85	27.9
11/8/03	Barge NY/25/Sample 1	7.10	25.5
11/9/03	Barge NY/25/Sample 2	6.85	13.2
11/10/03	Barge NY/25/Sample 3	6.92	12.0
11/11/03	Downing/4/Sample 1	6.78	17.5
11/12/03	Downing/4/Sample 2	6.54	19.4
11/14/03	Barge NY/26/Sample 1	6.47	33.4
11/15/03	Barge NY/26/Sample 2	6.77	24.2
11/16/03	Downing/5/Sample 1	6.68	45.8
11/17/03	Downing/5/Sample 2	6.67	40.8
11/18/03	Barge NY/27/Sample 1	6.72	24.2
11/19/03	Barge NY/27/Sample 2	6.42	27.9
11/20/03	Barge NY/27/Sample 3	6.87	13.4
11/21/03	Downing/6/Sample 1	6.88	37.4
11/22/03	Downing/6/Sample 2	6.74	58.2
11/24/03	Barge NY/28/Sample 1	6.97	41.6
11/25/03	Barge NY/28/Sample 2	6.30	40.4
11/26/03	Downing/7/Sample 1	6.71	33.7
11/26/03	Downing/7/Sample 2	6.74	43.8
11/27/03	Downing/7/Sample 3	6.95	41.4

¹December 15, 2003 letter from Mimi Drew, Director, Division of Water Resource Management, Florida Department of Environmental Protection to Jimmy Palmer, Regional Administrator, U.S. EPA Region 4. Re: Permit No. OD-03 Piney Point November 2003 Monthly Report

ii. Special Condition No. 21

Results of the toxicity tests on a sample collected prior to the initiation of dispersion activities were transmitted to the Agency under separate cover on July 1, 2003. It is the Department's understanding that these test results fulfill the requirements of Special Condition No. 21, provided the ammonia levels in the fully treated water remain below 50 milligrams per liter (mg/L).

It is recognized that the level of ammonia contained in the instantaneous grab sample collected on November 22nd contained more than 50 mg/L. However, the 6th voyage of the *Captain H.A. Downing* began loading at 2300 hours on November 20th and continued loading until 0552 hours on November 23rd. On a time weighted average basis, the data in Table A-1 averages 42 mg/L over this time period. Calculations supporting this conclusion are available upon request. Based upon these calculations, the Department believes that the concentration of ammonia in the water dispersed by the *Captain H.A. Downing* during its 6th voyage was less than the 50 mg/L threshold in Special Condition No. 21. Since these lab results were not available until the 28th, there was not time to collect a sample or conduct further testing prior to loading of the last shipment and expiration of the permit.

iii. Special Condition No. 22

In accordance with the approved *Sampling Plan for Dispersion of Fully-Treated Water*, 12 water samples were collected from the cargo holds of the *Captain H.A. Downing* during the initial loading of this second transport/dispersion vessel on October 28, 2003. The 12 cargo hold samples were manually composited into six composite samples. The six cargo hold composite samples, along with five discreet grab samples collected from a sampling port in the pipeline while the initial load was being transferred to the *Captain H.A. Downing*, were analyzed in accordance with the approved Supplemental Plan. The analytical results, which were transmitted to you on October 31, 2003, demonstrate that the transfer pipeline system and vessel cargo holds are not causing contamination of the treated water.